

REMARKS

This is intended as a full and complete response to the Office Action dated October 19, 2006, having a shortened statutory period for response set to expire on January 19, 2007. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-23 are pending in the application. Claims 1-6 and 11-15 remain pending following entry of this response. Claims 1, 2, 4, 11, 12 and 14 have been amended. Claims 7-10 and 16-23 have been cancelled. New claims 24-25 have been added to recite aspects of the invention. Applicants submit that the amendments and new claims do not introduce new matter.

Interview Summary

On February 6, 2007, a telephonic interview was held between Gero G. McClellan, attorney of record, and N. Hillery, Examiner of record. The parties discussed the cited reference, *Christian, et al.* Claim 1 was discussed. The parties also discussed proposed amendments to claim 1, which are reflected in this response.

During the interview, Applicants argued that the reference does not teach disabling at least a portion of user-selectable elements of a web page. No agreement could be reached at the time of the interview, but the Examiner agreed to update his search on the basis of the arguments and proposed amendments.

Claim Rejections - 35 U.S.C. § 102

Claims 1-6 and 11-15 are rejected under 35 U.S.C. 102(e) as being anticipated by *Christian et al.* (US 20050044139 A1, hereinafter *Christian*).

Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051,

1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, *Christian* does not disclose "each and every element as set forth in the claim". For example, *Christian* does not disclose "disabling at least portion of the user-selectable elements on the basis of a pre-defined transform definition to produce a re-configured web page". *Christian* is generally directed to tracking the behavior of users navigating through web pages. See, Background, paragraphs [0002] – [0005]. To this end, *Christian* teaches replacing links in a webpage with modified links that include a tracking identifier for use with a tracking system. See, abstract. When a modified link is selected, tracking is initiated for the link. *Id.* However, whether the link is the original (unmodified) link or a modified link, a user clicking on the link is ultimately directed to the target network address specified by the URL contained in the link. See, paragraph [0070] and *cf.* Figure 2 and Figure 4. The URL is the same for both links. [Note: Even assuming, *arguendo*, that the URL is not the same for both links, the fact is that a URL is still present and associated with link in either case.] In other words, the link of *Christian* is not disabled or made inaccessible in such a way as to disassociate any underlying functionality with the link. Therefore, *Christian* does not teach, show or suggest disabling at least portion of the user-selectable elements on the basis of a pre-defined transform definition to produce a re-configured web page, thereby making the one or more executable functions corresponding to the portion of the user-selectable elements inaccessible to the user viewing the re-configured web page without associating substituted functionality with the disabled portion of the user-selectable elements.

Therefore, the claims are believed to be allowable, and allowance of the claims is respectfully requested.

Claim Rejections - 35 U.S.C. § 103

Claims 4 and 14 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Christian* as applied to claims 1 and 11 above, and further in view of *Keating* (US 20020052895 A1).

Applicants respectfully traverse this rejection.

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. See MPEP § 2142. To establish a *prima facie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP § 2143. The present rejection fails to establish at least the third criterion.

Christian, as applied to claims 1 and 11, has been overcome for the reasons given above. Accordingly, the present rejection based on the combination of *Christian* with *Keating* is obviated.

Therefore, the claims are believed to be allowable, and allowance of the claims is respectfully requested.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

/Gero G. McClellan, Reg. No. 44,227/

Gero G. McClellan
Registration No. 44,227
PATTERSON & SHERIDAN, L.L.P.
3040 Post Oak Blvd. Suite 1500
Houston, TX 77056
Telephone: (713) 623-4844
Facsimile: (713) 623-4846
Attorney for Applicant(s)